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September 7, 2022

via ECF

Hon. Paul A. Engelmayer  
United States District Judge  
Southern District of New York  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

RE: **Case No. 1:21-cv-01535-PAE**  
***Brian Decker v. Argon Medical Devices, Inc., et al.***

Dear Judge Engelmayer:

Pursuant to the Hon. Judge Engelmayer's January 7, 2022, Order (ECF No. 64), the Parties have conferred and submit this joint letter to update the court on the status of the case. As of this date Argon Medical Devices and Rex Medical Inc., a/k/a Rex Medical, L.P. and a representative of the "Claimants" have signed Master Compromise, Settlement, Release and Indemnity Agreements which address thousands of claimants including the Plaintiff herein. These agreements were signed on December 22, 2021. Since that date individual settlement offers have been sent to each of the qualified claimants including Brian Decker.

The specific terms of the MSAs are confidential. The Parties anticipate the process may take an additional Ninety (90) days to process all of the individual responses to the settlement offers. The parties are working diligently on the other documents necessary to complete the settlement process as well as the creation of a qualified settlement fund and those actions necessary for allocation, funding, and distribution of settlement proceeds.

Plaintiff's counsel has been asked to inform the Court that notwithstanding the progress that has been made with regard to settlement, counsel for the firm of Lewis Brisbois Bisgaard & Smith, LLP anticipates filing a motion to withdraw as counsel for the Rex defendants next week.

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The parties would request that the court continue this case and all deadlines for at least ninety (90) days so that the Plaintiff herein will have a reasonable opportunity to assess the individual settlement offer made in his case.

Respectfully submitted,  
**MARTIN BAUGHMAN, PLLC**

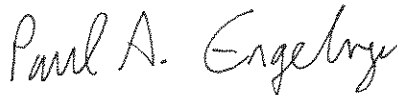
/s/ Laura J. Baughman  
Laura J. Baughman, Esq.  
NY Bar No. 4173399  
***Counsel for Plaintiff***

LJB/hl

cc: All counsel of record (*via ECF or US Mail*)

Granted. The case is stayed until December 8, 2022. At that point, the parties shall file a joint letter providing a status update to the Court and setting forth their views on proposed next steps.

SO ORDERED.



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PAUL A. ENGELMAYER  
United States District Judge  
September 8, 2022